



James C. Pruitt
Vice President
Government Relations
Department

Texaco

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By fax: (303) 231-3385
And overnight mail

March 15, 1999

Mr. David S. Guzy, Chief
Rules and Publications Staff
Minerals Management Service
Royalty Management Program
P.O. Box 25165
Mail Stop 3021
Building 85
Denver Federal Center
Denver, Colorado 80225-0165

Re: Notice of Proposed Rulemaking
Minerals Management Service Proposal for Appeals of MMS Orders
64 FR 1930 (January 12, 1999)

Dear Ms. Holman,

Texaco Inc. ("Texaco"), on behalf of itself and its affiliate, Texaco Exploration and Production Inc., appreciates the opportunity to submit comments on the Minerals Management Service's Proposal for Appeals of MMS Orders, 64 Fed. Reg. 1930 (January 12, 1999). In addition to the comments filed on behalf of Texaco and others by Gardere & Wynne, Texaco references and adopts as its own the comments filed by the American Petroleum Institute on this proposal.

Yours very truly,

James C. Pruitt
Vice President -- Government Relations Department



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